

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT AMERICAN INSURANCE COMPANY,

Plaintiff,

-against-

GEMSTONE PROPERTY MANAGEMENT LLC,
DHNY APT IV LLC and LUIS MANUEL
GARACIA SALCEDO,

Defendants.

-----X
GEMSTONE PROPERTY MANAGEMENT LLC,
DHNY APT IV LLC, and LUIS MANUEL
GARCIA SALCEDO,

Third-Party Plaintiffs,

-against-

ASPEN SPECIALTY INSURANCE COMPANY,
IRONSHORE INDEMNITY INC.,
DISTINGUISHED PROGRAMS INSURANCE
BROKERAGE LLC, DISTINGUISHED
PROPERTIES UMBRELLA MANAGERS INC.,
and THE O&S INSURANCE BROKERAGE
GROUP, INC. *c/o its successor HUB*
INTERNATIONAL LIMITED,

Third-Party Defendants.

TO: Brian J. Isaac, Esq.
POLLACK, POLLACK, ISAAC, & DECICCO, LLP
250 Broadway, Suite 600
New York, NY 10007
Email: bji@ppid.com
Attorneys for Non-Party, Subin Associates, LLP
(via email)

All counsel of record.
(via ECF)

Case No.: 23-cv-09100 (LJL) (GS)

**NOTICE OF MOTION
TO COMPEL PRODUCTION**

ORAL ARGUMENT REQUESTED

Opposition to Great American's motion to compel will be due Aug. 11, 2025. Any reply will be due Aug. 18, 2025. The Court will hold a hearing on the motion on Aug. 21, 2025 at 10 a.m. in Courtroom 15C, 500 Pearl Street, New York, NY 10007.

July 29, 2025

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

PLEASE TAKE NOTICE that, on a date and time convenient for the Court, the undersigned counsel for Plaintiff GREAT AMERICAN INSURANCE COMPANY (“Great American”) will move before the Honorable Lewis J. Liman, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, Courtroom 15C, New York, NY 10007, for an order compelling Non-Party Subin Associates, LLP to produce documents in response to Great American’s January 30, 2025 document subpoena, pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), the Court’s March 17, 2025 written order (ECF No. 154), the Court’s May 22, 2025 oral order, and the Court’s July 22, 2025 written order (ECF Nos. 165, 167) (“Motion”).

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, Great American will rely on the legal brief and affidavit of Mark. R. Vespole, Esq. submitted herewith.

PLEASE TAKE FURTHER NOTICE that Great American requests oral argument.

Dated: July 28, 2025
Madison, NJ

**WILSON, ELSER, MOSKOWITZ,
EDELMAN, & DICKER, LLP**

By: /s/ Mark R. Vespole, Esq.
Mark R. Vespole, Esq.
7 Giralda Farms, Suite 100/110
Madison, NJ 07940
Phone: (973) 735-6134
Email: mark.vespole@wilsonelser.com
*Attorneys for Plaintiff,
Great American Insurance Company*